Submission against Port Waratah Coal Services Terminal 4 – application number 10_0215

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"If we don't change direction soon, we'll end up where we're heading"
(International Energy Agency, *World Energy Outlook 2011*)

Greenpeace objects to the construction of Port Waratah Coal Services' Terminal 4 in Newcastle (application number 10_0215) on the grounds that:

1. it will add significantly to greenhouse gas emissions worldwide and fuel global climate change;
2. it poses unacceptable risks to human health in Newcastle and the Hunter Valley;
3. it will have unacceptable impacts on matters of national environmental significance in the Kooragang wetlands.

Greenpeace supports the efforts of local environment groups in Newcastle to prevent this project going ahead as it is entirely inconsistent with the action needed to avoid dangerous climate change and with the principles of sustainable development.

The proposed coal terminal expects to reach a capacity of 120Mt tonnes after all work is concluded, this amounts to doubling Newcastle's current export capacity, and increasing Australia's total coal exports by over 40%[1].

At a time when the world needs to be making an urgent transition away from coal dependence towards renewable energy, such a large expansion in coal exporting infrastructure is inappropriate.

1. Greenhouse pollution and climate change

Australia has made a commitment, along with 193 other countries, to limit global warming to below two degrees above pre-industrial temperatures. The adequacy of that goal to protect the world and its people from climate change will be under review from January next year, but it is Australian Government policy that Australia be part of a global solution to climate change that is capable of stabilising concentrations of greenhouse gas emissions in the atmosphere at 450ppm or less. This project is entirely inconsistent with that goal.

Under current policies, the International Energy Agency concurs with many other analysts in warning that "the world is on a trajectory that results in a level of emissions consistent with a long-term average temperature increase of more than 3.5°C"[2]

The IEA warns that "Four-fifths of the total energy-related CO_2 emissions permissible by 2035 in the 450 Scenario are already "locked-in" by our existing capital stock (power plants, buildings, factories, etc.)": the entire budget will be locked into existing infrastructure by 2017 under current policies.

[1] Total Australian coal exports were 284 mtpa in 2010-2011.
[2] IEA *World Energy Outlook 2011*. November 2011. http://www.worldenergyoutlook.org/

Burning coal for electricity creates a third of global greenhouse gases, and the coal we export is Australia's biggest single contribution to the problem. Expanding this industry at a time when 300,000 people have been estimated to die every year as a result of climate change[3], at a time when Australians in the Torres Strait and Gulf of Carpentaria are experiencing sea level rise two-to-three times the global average[4] is irresponsible and unconscionable.

Port Waratah's Proposed Terminal 4

The Environmental Assessment for Port Waratah Coal Services Terminal 4 (T4) states that "Scope 3 emissions will not be directly generated by the T4 Project and are beyond the control of PWCS." This is an absurd proposition, as the coal exported by PWCS can have no other purpose than to be burnt for power by customers of PWCS. Furthermore, the Director-General's Requirements for the Assessment mandated that PWCS include "cumulative impacts" of the proposal. There is no other point in Australia's legislative and regulatory frameworks where the impact of these emissions will be assessed: doing so as part of this Environmental Assessment is entirely appropriate.

Tellingly, PWCS contextualises its Scope 1 and 2 greenhouse emissions against Australian and global levels of emissions that fit the "business-as-usual" scenario. This scenario means increasing the concentrations of greenhouse gases in the atmosphere to over 1000ppm, leading to global warming of more than between four and six degrees Celsius above pre-industrial temperatures and resulting in runaway climate change. This is despite a global consensus and decision of the United Nations Framework Convention on Climate Change to limit warming to below two degrees above pre-industrial temperatures.

Similarly, PWCS estimate their Scope 3 emissions of 298.6Mtpa as a proportion of global emissions of 70Gt per year in 2030, giving an inaccurate picture of the contribution of this project to global pollution levels. This picture of the world is also inconsistent with pledged emissions reductions by major emitting countries of all kinds world-wide. Though not adequate yet to reduce emissions sufficient to meet the two degree goal, pledges made at the Durban Conference of the Parties to the UNFCCC will mean global emissions 55Gt per annum in 2020, after which all countries have agreed to further binding emissions reductions[5]. To have a 50-50 chance of meeting the agreed "below 2 degrees" goal, this needs to fall to 35Gt by 2030.

A more accurate assessment would have contextualised the project within the likely 2020 and 2030 budgets consistent with current pledged mitigation levels, and emissions levels required to meet the 2 degree warming limit. Given that this project will nearly double PWCS's current Scope 3 emissions, and the Director-General's Requirements mandated the assessment to consider cumulative impacts, we have estimated the more accurate picture of PWCS's total Scope 3 emissions in a carbon constrained world. PWCS are already responsible for 319.2Mtpa of carbon dioxide emissions (based on PWCS's estimates of their current capacity on their website). We calculate that in 2030, PWCS will be responsible for Scope 3 emissions of around 617Mtpa – more than Australia's current total annual emissions and 3.5% of total annual emissions in 2030 if the world is acting consistently with a 50% chance of meeting its agreed goal of keeping warming to below two degrees.

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[3] *The Anatomy of a Silent Crisis*. The *Human Impact Report: Climate Change*. Global Humanitarian Forum. 2009. http://www.bb.undp.org/uploads/file/pdfs/energy_environment/CC%20human%20impact%20report.pdf

[4] CSIRO. *State of the Climate 2012*. http://www.csiro.au/en/Outcomes/Climate/Understanding/State-of-the-Climate-2012/Oceans.aspx

[5] See Climate Action Tracker "After Durban". December 2011. http://climateactiontracker.org/assets/publications/briefing_papers/CAT_Durban_update_2_20111211.pdf

By situating their greenhouse gas assessment in a world where no country is taking action to mitigate greenhouse gases, PWCS make it clear which direction they are pulling in the global battle to avoid dangerous climate change. They also make it clear that their proposal is out-of touch with global political, economic and environmental trends and agreements.

2. Human Health impacts

Greenpeace does not believe that the proponent has given adequate consideration to the likely health impacts resulting from coal dust from the additional coal trains passing through highly populated areas.

The EIS states that *"It is not anticipated that the T4 project will significantly affect the surrounding air quality environment."* However, there is insufficient information in the EIS to establish that this is indeed the case. The EIS therefore comes across as misleading and dismissive of what are very serious concerns for the local community.

Significant additional research is required to better explore the current background pollution levels and to determine the impacts of increased concentrations of air pollution, particularly fine particles (PM_1). The proponent should also be required to consider the benefits of covering all coal wagons to minimise particulate pollution, as has been standard practice in parts of Europe for many years.

3. Local environmental impacts

As well as the global environmental impacts that would be facilitated by the T4 expansion, and the impacts on the health of people living in the vicinity of the rail lines and coal stockpiles, Greenpeace share the concerns of local conservationists over the immediate and direct environmental impacts on the Kooragang wetlands.

The 312ha project site includes 91ha of valuable native vegetation and is home to 18.8ha of saltmarsh (an endangered ecological community under the Threatened Species Conservation Act (TSC)), 28.9ha of mangrove and 27.3ha of freshwater wetland, 4ha of which are listed as an endangered community under the TSC Act.

Deep Pond is the only freshwater drought refuge in the Lower Hunter Estuary system. It is relied upon by at least 15 species of waterfowl, three of which are listed as threatened under the TSC Act. At least 11 species of migratory birds recognised by international treaties rely on the habitat of deep pond and its proximity to the RAMSAR listed wetland. Deep pond should be protected.

The project would also result in the loss of habitat for 23 threatened fauna species including the Australasian bittern (listed as endangered under the Environmental Protection and Biodiversity Conservation (EPBC) Act), and the Green and Golden Bell frog (also listed as vulnerable under the EPBC Act).

Without wanting to give legitimacy to the concept of offsetting, the proposed offset site at Ellalong is completely unsuitable as it has already been identified as critical for conservation in its own right.

The proposed site for the project has conservation value that greatly exceeds any short-term economic value that the project may provide. Greenpeace considers that the T4 project should be rejected outright.